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Amalia Rodriguez-Mendoza
District Clerk
Travis County
D-1-GN-11-003130

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January 13, 2014

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P.O. Box 12548, Capitol Station
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Via Email

Re: *The Texas Taxpayer & Student Fairness Coalition, et al. v. Michael Williams, et al.*
Cause No. D-1-GN-11-003130 [Rule 11 Agreement – Dr. Wayne Pierce Data
Correction]

Dear Counsel:

This letter serves as a binding agreement among the attorneys for the Texas Taxpayer and Student Fairness Coalition, et al, and for the State Defendants under Texas Rule of Civil Procedure 11 regarding the data correction by Dr. Wayne Pierce. The data correction only affects those calculations, charts, and backup data which relate to, or deal with, I&S at the I&S adopted rates. The data correction does not affect M&O calculations, charts, or backup data, does not affect M&O Yield calculations, charts, or backup data, or Max M&O calculations, charts, or backup data. The only parts of Dr. Wayne Pierce's analysis affected by this correction are parts which relate to, or utilize, I&S at the I&S adopted rates.

The only charts/tabs within the FY14(13) and FY15(13) Excel Spreadsheets, which were sent on January 6, 2014, that were changed as a result of the data correction are those with "I&S" located within the title to the chart, except for when I&S is placed at the maximum amount allowed by law (\$0.50 or \$1.67). The columns that were changed on each of the "Calc" tabs located within each of the spreadsheets for FY14(13) and FY15(13), rows 3-32 are the following: "Average I&S Revenue per WADA at ATR" (Column W), "Average I&S Yield at ATR" (Column X), "Average Classroom Disadvantage" (Column Y), "M&O + I&S Average Revenues per WADA at ATRs" (Column AA), "M&O + I&S Average Yields at ATRs" (Column AB), "Average Classroom Disadvantage" (Column AC), "Average I&S Revenue at ATR" (Column AO), "Average I&S Yield at ATR" (Column AP), "Average Classroom Disadvantage" (Column AQ), "M&O + I&S Average Revenues per WADA at ATRs" (Column

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AS), "M&O + I&S Average Yields at ATRs" (Column AT), and "Average Classroom Disadvantage" (Column AU). For rows 37-1,057, on the "Calc" tabs, the relevant changes are found in the following columns: "I&S Revenue per WADA at I&S Tax Rate" (Column AE), "I&S Revenue Yield at I&S Tax Rate" (Column AF), "M&O + I&S Average Revenues per WADA at ATRs" (Column AI), and "M&O + I&S Average Yields at ATRs" (Column AJ). The only columns that were changed in the District by District Reports for FY14(13) and FY15(13), which were sent on January 2, 2014, are the columns labeled "I&S Revenue per WADA at I&S Tax Rate" (Column Q) and "I&S Revenue Yield at I&S Tax Rate" (Column R). The charts/tabs with the FY13 Excel Spreadsheets and the FY13 District by District Reports were unchanged.

Further, the Texas Taxpayer and Student Fairness Coalition, et al, stipulates that Dr. Wayne Pierce will be the last witness called amongst their plaintiff group, the Fort Bend ISD plaintiff group, the Edgewood ISD plaintiff group, and the Calhoun County ISD plaintiff group.

If this letter represents your understanding of the agreement, and you agree to its terms, please sign below.

Yours truly,

GRAY & BECKER, P.C.

By: 
Richard E. Gray, IV

AGREED:

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